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3	breitz@bhfs.com BROWNSTEIN HYATT FARBER SCHRECK, LLP				
4	100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614				
5	Telephone: 702.382.2101 Facsimile: 702.382.8135				
6	Attorneys for Defendants Volkswagen Group of				
7	America, Inc.				
8	UNITED STATES DISTRICT COURT				
9	DISTRICT OF NEVADA				
10	DAVE CLEGG, an individual;	Case No.: 2:16-cv-01731-RFB-PAL			
11	Plaintiff,	STIPULATION AND PROPOSED ORDER			
12	V.	TO EXTEND TIME			
13	VOLKSWAGEN GROUP OF AMERICA, INC., a corporation; VOLKSWAGEN				
14	AKTIENGESELLSCHAFT, a business entity, form unknown; AND DOES 1				
15	through 20, inclusive,				
16	Defendants.				
17	Defendant Volkswagen Group of America, Inc. ("VWGoA" or "Defendant"), by and				
18	through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and				
19	Plaintiff Dave Clegg ("Plaintiff"), by and through the undersigned counsel of record, the law firm				
20	of Hyde & Swigart, hereby stipulate and agree as follows:				
21	In order to conserve the resources of the parties, their counsel and the judiciary, Defendant				
22	shall have thirty (30) days to answer or otherwise respond to Plaintiff's Complaint following				
23	entry of this Court's decision on Defendant's Motion to Stay (ECF No. 4).				
24					
25					
26					
27					
28					

BROWNSTEIN HYATT FARBER SCHRECK, LLP By: _/s/ Jeffrey S. Rugg JEFFREY S. RUGG, ESQ, BENJAMIN K. REITZ, ESQ, 100 North City Parkway, Suite 1600 Las Vegas, NV 89105-4614 Telephone: (619) 223-7770 Faesimile: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc. IT IS SO ORDERED: IT IS SO ORDERED: UNITED ATATES MAGISTRATE JUDG DATED: _August 9, 2016		Case 2:16-cv-01731-RFB-PAL Documen	nt 7 Filed 08/09/16 Page 2 of 3
By: /s/ Jeffrey S. Rugg JEFFREY S. RUGG, ESQ. 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc. IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: August 9, 2016	1	Dated this 8th day of August, 2016.	Dated this 8th day of August, 2016.
By: _/s/ Jeffrey S. Rugg JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc. By: _/s/ Sara Khosroabadi SARA KHOSROABADI, ESQ. 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022 Attorneys for Plaintiff Dave Clegg IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: _August 9, 2016			HYDE & SWIGART
JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc. SARA KHOSROABADI, ESQ. 7854 W. Sabara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022 Facsimile: (619) 297-1022 Attorneys for Plaintiff Dave Clegg IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: August 9, 2016	-	By: /s/ Leffrey S. Rugg	By: /s/ Sara Khosroahadi
Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc. IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: _August 9, 2016		JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600	SARA KHOSROABADI, ESQ. 7854 W. Sahara Ave.
Attorneys for Defendants Volkswagen Group of America, Inc. IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED:August 9, 2016		Las Vegas, NV 89106-4614	Telephone: (619) 223-7770
IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: August 9, 2016		Attorneys for Defendants Volkswagen Group	Attorneys for Plaintiff Dave Clegg
IT IS SO ORDERED: UNITED STATES MAGISTRATE JUDG DATED: August 9, 2016		, ,	
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DATED: August 9, 2016			IT IS SO ORDERED:
DATED: August 9, 2016			
			UNITED STATES MAGISTRATE JUDG
			DATED. August 9, 2016
			DITIED
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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE					
Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing					
Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK,					
LLP, and that the foregoing STIPULATION AND PROPOSED ORDER TO EXTEND TIME					
was served via electronic service on the 8th day of August, 2016 and to the addresses shown					
below:					
SARA KHOSROABADI, ESQ. sara@westcoastlitigation.com HYDE & SWIGART 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022 Attorneys for Plaintiff Dave Clegg					

/s/ Karen Wiehl	
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An employee of Brownstein Hyatt Farber Schreck, LLP

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